



32 Broadway, Suite 1310, New York, NY 10004 | Phone: (212) 401-6222 | Fax: (888) 370-2397 | ali@najmilaw.com

VIA ECF

December 21, 2023

Magistrate Judge Taryn Merkl
United States District Court – EDNY
225 Cadman Plaza East
Brooklyn, NY 11201

**RE: Trooper 1 v. New York State Police et al. 1:22-cv-00893 (LDH) (TAM)
Legislative Privilege of Non-Party Alessandra Biaggi**

Dear Judge Merkl:

We are writing to alert the Court of an update in our client's position and stated objections to the non-party subpoena served on her by Defendant Andrew Cuomo. In previous communications to the Court, including the joint status letter filed with Defendant's counsel (ECF No. 193), we asserted a legislative privilege as a basis for objection to the subpoena. We now withdraw the objection based on legislative privilege; however, we continue to maintain each and every other objection outlined in the joint status letter and other communications to the Court.

Sincerely,

/s/

ALI NAJMI, ESQ.